

NOD Schedule: Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)

	Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Specific Regulatory Citation for Disclosed Violation	
				Federal Citation	State Citation
1	CAA - NESHAP	Campus-Wide	No asbestos disposal records (Notice of Intent) on file for asbestos abatement project for (Engineering Building, Maintenance Office, and Science Building heating system)	40 CFR 61.150(d)	MAC, 1995 AACRS R 336.1942 (Rule 942)
2	CAA - NESHAP	Pole Barn	Potential asbestos containing waste materials (i.e. floor tiles and mastic) are not being stored in accordance with the packaging and labeling requirements of the NESHAP Asbestos standard.	40 CFR 61.150(a) & (b)	MAC, 1995 AACRS R 336.1942 (Rule 942)
3	CWA	Applied Research Center Environmental Chamber	Wastewater from the tank in the environmental chamber is being discharged outside to the storm drain and may have a pH >10 units and contain high levels of salt.	40 CFR 122	R. 323.2106
4	CWA	Architecture Building Room 121	Failure to test or obtain approval from the POTW to discharge untreated fixer waste to sink drains and the sanitary sewer.	40 CFR 403.5(a)	R. 323.2303
5	CWA	Campus-Wide	Failure to test the floor stripper wastewater prior to discharge to ensure compliance with the local sewer use ordinance.	40 CFR 403.5	R. 323.2303
6	CWA	Center for Innovative Materials Research Environmental Chamber	Wastewater from the brine tank in the environmental chamber is being discharged down to the drain to the sanitary sewer and may have a pH >10 units.	40 CFR 403.5(a)	R. 323.2303
7	CWA	Engineering Building 1st Floor-Mechanical Room	Failure to test air compressor condensate for oil and grease (at a minimum) prior to discharge to a floor drain to ensure compliance with the local sewer ordinances.	40 CFR 403.5(a)	R. 323.2303
8	CWA	Science Building Room 325	Failure to test or obtain approval from the POTW to discharge acetone from cleaning glassware to sink drains.	40 CFR 403.5(a)	R. 323.2303
9	CWA	Science Power House	Failure to test air compressor condensate for oil and grease (at a minimum) prior to discharge to a floor drain to ensure compliance with the local sewer ordinances.	40 CFR 403.5(a)	R. 323.2303
10	CWA - SPCC	Art and Design Center Room 103	Approximately one (1)-80 gallon elevator hydraulic oil reservoir has the potential to discharge oil to a floor drain located in the vicinity of the reservoir yet no secondary containment is provided	40 CFR 112.7	N/A - No equivalent state regulation
11	CWA - SPCC	Campus-Wide	Failure to train oil handling employees in operation and maintenance of equipment to prevent discharges, discharge procedure protocols, applicable pollution control laws, rules, and regulations, general facility operations, and the contents of the campus-wide SPCC plan.	40 CFR 112.7(f)	N/A - No equivalent state regulation
12	CWA - SPCC	Campus-Wide	The campus maintains greater than 1,320 gallons of oil on campus in minimum 55 gallon capacity containers in a manner which could affect navigable waterways yet has failed to develop and implement a Spill Prevention, Control and Countermeasure (SPCC) Plan that includes all oil storage on-site.	40 CFR 112.3	N/A - No equivalent state regulation
13	CWA - SPCC	Campus-Wide	The campus maintains greater than 1,320 gallons of oil on campus in minimum 55 gallon capacity containers in a manner which could affect navigable waterways yet has failed to conduct and document the inspection of oil storage on-site.	40 CFR 112.7(e)	N/A - No equivalent state regulation
14	CWA - SPCC	Wayne H. Buell Management Building Outside-Loading Dock Area	The 250 gallon bulk container of waste grease is not provided with secondary containment and is in an area which may affect navigable waterways via stormwater drains < 5 feet away on campus.	40 CFR 112.12	N/A - No equivalent state regulation

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15	EPCRA	Campus Wide	Road salt, OSHA Hazardous Substances, are stored on campus in exceedance of the 10,000 lb TPQ but were not included on an annual Tier II report.	40 CFR 370.20 40 CFR 370.40 40 CFR 370.41 40 CFR 370.42 40 CFR 370.43 40 CFR 370.44 40 CFR 370.45	N/A - No equivalent state regulation
16	EPCRA	Campus-Wide	Road salt, OSHA hazardous substances, above their threshold quantity yet has failed to submit the corresponding MSDS to the SERC, LEPC, and local fire department.	40 CFR 370.20 40 CFR 370.30 40 CFR 370.31 40 CFR 370.32 40 CFR 370.33	N/A - No equivalent state regulation
17	RCRA - Hazardous Waste	Applied Research Center Baja Laboratory	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302(1) R 299.9205(2)(a)
18	RCRA - Hazardous Waste	Applied Research Center Throughout	Oil filters have not been properly classified as hazardous or non-hazardous prior to their disposal in the general trash	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
19	RCRA - Hazardous Waste	Applied Research Center Vehicle Dynamics Laboratory	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302(1) R 299.9205(2)(a)
20	RCRA - Hazardous Waste	Custodial Services Campus-Wide	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302(1) R 299.9205(2)(a)
21	RCRA - Hazardous Waste	Engineering Building Engineering Loading Dock	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302(1) R 299.9205(2)(a)
22	RCRA - Hazardous Waste	Field House Room R6	Used rags have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
23	RCRA - Hazardous Waste	Maintenance Building Automotive Shop	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302(1) R 299.9205(2)(a)
24	RCRA - Hazardous Waste	Maintenance Building Automotive Shop	Oil filters disposed as general trash	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
25	RCRA - Hazardous Waste	Maintenance Building Paint Shop	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302(1) R 299.9205(2)(a)
26	RCRA - Hazardous Waste §261, Subpart A	Maintenance Building Paint Shop	Containers of waste paint do not meet the definition of "empty" prior to being disposed in the general trash.	40 CFR 261.7	R299.9207
27	RCRA - Hazardous Waste §262, Subpart A	Affleck House Laundry Room	Peer auditors identified obsolete chemicals (i.e. paint stripper, concrete patch, aerosol can) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
28	RCRA - Hazardous Waste §262, Subpart A	Applied Research Center Aeronautics Laboratory	Waste fuel used in the aeronautics laboratory have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)

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29	RCRA - Hazardous Waste §262, Subpart A	Applied Research Center Flammable Cabinet	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
30	RCRA - Hazardous Waste §262, Subpart A	Applied Research Center Mini Baja Laboratory	Used oily rags used to work on baja vehicles in the laboratory have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
31	RCRA - Hazardous Waste §262, Subpart A	Applied Research Center New Paint Booth	Used paint filters have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
32	RCRA - Hazardous Waste §262, Subpart A	Applied Research Center Throughout	Used rags/absorbent sheets have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
33	RCRA - Hazardous Waste §262, Subpart A	Architecture Building Room 121	Peer auditors identified obsolete photo development chemicals (i.e. fixer, developer) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
34	RCRA - Hazardous Waste §262, Subpart A	Engineering Building 1st Floor-Mechanical Room	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
35	RCRA - Hazardous Waste §262, Subpart A	Engineering Building 1st Floor-Mechanical Room	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
36	RCRA - Hazardous Waste §262, Subpart A	Engineering Building High Bay-Electrical Room	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
37	RCRA - Hazardous Waste §262, Subpart A	Engineering Building Metal Fabrication Laboratory	Dust and debris (metal, stainless steel, plexiglass) from sandblasting have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
38	RCRA - Hazardous Waste §262, Subpart A	Engineering Building Room E19	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
39	RCRA - Hazardous Waste §262, Subpart A	Engineering Building Room E2 - Geo and Material Laboratory	Peer auditors identified obsolete chemicals (tar-like substance) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)

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40	RCRA - Hazardous Waste §262, Subpart A	Engineering Building Wood Shop - Room E3	Used filters have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
41	RCRA - Hazardous Waste §262, Subpart A	Engineering Building Wood Shop - Room E3	Used filters have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
42	RCRA - Hazardous Waste §262, Subpart A	Engineering Building Wood Shop - Room E3	Waste solvents used in the wood shop area have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
43	RCRA - Hazardous Waste §262, Subpart A	Field House Room R6	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
44	RCRA - Hazardous Waste §262, Subpart A	Maintenance Building Automotive Shop	Used rags have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
45	RCRA - Hazardous Waste §262, Subpart A	Maintenance Building Automotive Shop	Waste diesel oil has not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
46	RCRA - Hazardous Waste §262, Subpart A	Maintenance Building Automotive Shop	Waste transmission fluid has not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
47	RCRA - Hazardous Waste §262, Subpart A	Maintenance Building Paint Shop	Used rags have not been properly classified as hazardous or non-hazardous prior to their disposal in the trash.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
48	RCRA - Hazardous Waste §262, Subpart A	Maintenance Building Paint Shop	Waste oil-based paint has not been properly classified as hazardous or non-hazardous prior to their disposal in the trash.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
49	RCRA - Hazardous Waste §262, Subpart A	Maintenance Building Paint Shop	Used paint thinner has not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
50	RCRA - Hazardous Waste §262, Subpart A	Maintenance Building Wood Shop	Peer auditors identified obsolete aerosol cans of enamel, grease, and paint as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
51	RCRA - Hazardous Waste §262, Subpart A	Pole Barn Exterior	Peer auditors identified obsolete gasoline as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)

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52	RCRA - Hazardous Waste §262, Subpart A	Pole Barn Exterior	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
53	RCRA - Hazardous Waste §262, Subpart A	Pole Barn Interior	Peer auditors identified obsolete ethanol as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
54	RCRA - Hazardous Waste §262, Subpart A	Pole Barn Interior	Peer auditors identified obsolete chemicals (i.e. concrete crack filler, adhesives, roof cement, hypochlorite solvent, Zep, methanol, seal-o-solve solvent, etc.) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
55	RCRA - Hazardous Waste §262, Subpart A	Science Building Room 211 - Dark Room	Peer auditors identified obsolete chemicals of fixer, developer, stop bath, bleach solution, pump oil and glycerin, as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
56	RCRA - Hazardous Waste §262, Subpart A	Science Building Room 211 - Radiology Room	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
57	RCRA - Hazardous Waste §262, Subpart A	Science Building Room 305	Unknown waste (yellow) in a glass beaker has not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
58	RCRA - Hazardous Waste §262, Subpart A	Science Building Room 315	Peer auditors identified obsolete chemicals in the chemical stock room (i.e. HCL, tri-chloro benzene, sodium, granular carbon, etc.) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
59	RCRA - Hazardous Waste §262, Subpart A	Science Building Room 319	Waste solvents in fume hood have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
60	RCRA - Hazardous Waste §262, Subpart A	Science Building Room 319	Unknown waste (blue liquid) in a glass beaker has not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
61	RCRA - Hazardous Waste §262, Subpart A	University Technology and Learning Center Media Services	Peer auditors identified obsolete chemicals of fixer, developer, and stop bath, as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)

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62	RCRA - Hazardous Waste §262, Subpart A	Wayne H. Buell Management Building Penthouse - Elevator	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
63	RCRA - Hazardous Waste §262, Subpart A	Wayne H. Buell Management Building Penthouse - Elevator Room	Used rags have not been properly classified as hazardous or non-hazardous prior to their disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)
64	RCRA - Universal Waste	A. Alfred Taubman Student Services Center Mechanical Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(c)	R 299.9228 (4)(c) (iv)
65	RCRA - Universal Waste	A. Alfred Taubman Student Services Center Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
66	RCRA - Universal Waste	A. Alfred Taubman Student Services Center Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
67	RCRA - Universal Waste	Affleck House Throughout	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(c)	R 299.9228 (4)(c) (iv)
68	RCRA - Universal Waste	Affleck House Throughout	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
69	RCRA - Universal Waste	Affleck House Throughout	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
70	RCRA - Universal Waste	Architecture Building Room A 106	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
71	RCRA - Universal Waste	Architecture Building Room A 106	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
72	RCRA - Universal Waste	Architecture Building Room A 106	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228.(4)(a)
73	RCRA - Universal Waste	Art and Design Center Campus Security	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."	40 CFR 273.14(a)	R 299.9228.(4)(a)
74	RCRA - Universal Waste	Art and Design Center Campus Security	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228.(4)(a)
75	RCRA - Universal Waste	Art and Design Center Mechanical Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)

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76	RCRA - Universal Waste	Art and Design Center Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
77	RCRA - Universal Waste	Art and Design Center Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228.(4)(a)
78	RCRA - Universal Waste	Art and Design Center Room CW21	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."	40 CFR 273.14(a)	R 299.9228(4)(a)
79	RCRA - Universal Waste	Art and Design Center Room CW21	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228.(4)(a)
80	RCRA - Universal Waste	Buisness Services 1st Floor - Storage Closet	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
81	RCRA - Universal Waste	Buisness Services 1st Floor - Storage Closet	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
82	RCRA - Universal Waste	Buisness Services 1st Floor - Storage Closet	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
83	RCRA - Universal Waste	Buisness Services Room J31	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
84	RCRA - Universal Waste	Buisness Services Room J31	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
85	RCRA - Universal Waste	Buisness Services Room J31	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
86	RCRA - Universal Waste	Campus-Wide	Personnel who handle or have the responsibility for managing universal wastes have not been informed of the proper handling and emergency procedures appropriate to the universal wastes generated on-site	40 CFR 273.16	R 299.9228(4)(a)
87	RCRA - Universal Waste	Engineering Building 1st Floor - Custodial Closet	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
88	RCRA - Universal Waste	Engineering Building 1st Floor - Custodial Closet	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
89	RCRA - Universal Waste	Engineering Building 1st Floor - Custodial Closet	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
90	RCRA - Universal Waste	Engineering Building Engineering Loading Dock	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."	40 CFR 273.14(a)	R299.9228 (4)(a)

NOD Schedule: Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)

	Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Specific Regulatory Citation for Disclosed Violation	
				Federal Citation	State Citation
91	RCRA - Universal Waste	Engineering Building Engineering Loading Dock	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228.(4)(a)
92	RCRA - Universal Waste	Engineering Building Metal Fabrication Laboratory	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."	40 CFR 273.14(a)	R299.9228 (4)(a)
93	RCRA - Universal Waste	Engineering Building Metal Fabrication Laboratory	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228.(4)(a)
94	RCRA - Universal Waste	Field House Room R6	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
95	RCRA - Universal Waste	Field House Room R6	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
96	RCRA - Universal Waste	Field House Room R6	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
97	RCRA - Universal Waste	Pole Barn Interior	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."	40 CFR 273.14(a)	R 299.9228.(4)(a)
98	RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228.(4)(a)
99	RCRA - Universal Waste	Pole Barn Interior	Leaking and/or damaged used lamps are not being cleaned up and broken contents placed in containers that are closed and structurally sound.	40 CFR 273.13(d)(2)	R 299.9228 (4) (c) (ii)
100	RCRA - Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
101	RCRA - Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
102	RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
103	RCRA - Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
104	RCRA - Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
105	RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
106	RCRA - Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
107	RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)

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	Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Specific Regulatory Citation for Disclosed Violation	
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108	RCRA - Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words 'Universal Waste Electric Lamps', 'Used Electric Lamps', or 'Waste Electric Lamps'	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
109	RCRA - Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
110	RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
111	RCRA - Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words 'Universal Waste Electric Lamps', 'Used Electric Lamps', or 'Waste Electric Lamps'	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
112	RCRA - Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
113	RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
114	RCRA - Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words 'Universal Waste Electric Lamps', 'Used Electric Lamps', or 'Waste Electric Lamps'	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
115	RCRA - Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
116	RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
117	RCRA - Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words 'Universal Waste Electric Lamps', 'Used Electric Lamps', or 'Waste Electric Lamps'	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
118	RCRA - Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
119	RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
120	RCRA - Universal Waste	Professional Development Center Mechanical Room	Containers in which used lamps are stored are not labeled with the words 'Universal Waste Electric Lamps', 'Used Electric Lamps', or 'Waste Electric Lamps'	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
121	RCRA - Universal Waste	Professional Development Center Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
122	RCRA - Universal Waste	Professional Development Center Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)

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	Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Specific Regulatory Citation for Disclosed Violation	
				Federal Citation	State Citation
123	RCRA - Universal Waste	Science Building 1st Floor - Hallway	Leaking and/or damaged used lamps are not being cleaned up and broken contents placed in containers that are closed and structurally sound.	40 CFR 273.13(d)(2)	R 299.9228 (4)(c) (iii)
124	RCRA - Universal Waste	Science Building 1st Floor - Hallway	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
125	RCRA - Universal Waste	Science Building 1st Floor - Hallway	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
126	RCRA - Universal Waste	Science Building 1st Floor - Hallway	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
127	RCRA - Universal Waste	Science Building 1st Floor - Mechanical Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
128	RCRA - Universal Waste	Science Building 1st Floor - Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
129	RCRA - Universal Waste	Science Building 1st Floor - Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
130	RCRA - Universal Waste	Science Building Basement	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
131	RCRA - Universal Waste	Science Building Basement	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
132	RCRA - Universal Waste	Science Building Basement	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
133	RCRA - Universal Waste	University North Housing 3rd Floor - Mechanical Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)
134	RCRA - Universal Waste	University North Housing 3rd Floor - Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
135	RCRA - Universal Waste	University North Housing 3rd Floor - Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
136	RCRA - Universal Waste	University South Housing Room 108 - Maintenance Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)

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	Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Specific Regulatory Citation for Disclosed Violation	
				Federal Citation	State Citation
137	RCRA - Universal Waste	University South Housing Room 108 - Maintenance Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)
138	RCRA - Universal Waste	University South Housing Room 108 - Maintenance Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)
139	RCRA-Used Oil Management	Applied Research Center Lab Space	Peer auditors observed one (1) improperly labeled 1-gallon container of used oil.	40 CFR 279.22	R 299.9810 (3)
140	RCRA-Used Oil Management	Applied Research Center Near Point Booth	Peer auditors observed two improperly labeled 55-gallon drums of used oil.	40 CFR 279.22	R 299.9810 (3)
141	RCRA-Used Oil Management	Applied Research Center Outside Flammable Cabinet #1	Peer auditors observed one (1) improperly labeled 55-gallon drums of used oil.	40 CFR 279.22	R 299.9810 (3)
142	RCRA-Used Oil Management	Engineering Building Engineering Loading Dock	Peer auditors observed four (4) improperly labeled 5-gallon containers of used oil.	40 CFR 279.22	R 299.9810 (3)
143	RCRA-Used Oil Management	Engineering Building Room E2 - Geo and Material Laboratory	Peer auditors observed one (1)-1000 ml beaker improperly labeled and uncovered container of used oil.	40 CFR 279.22	R 299.9810 (3)
144	RCRA-Used Oil Management	Maintenance Building Automotive Shop	Peer auditors observed two (2) improperly labeled 5-gallon container of used oil.	40 CFR 279.22	R 299.9810 (3)
145	RCRA-Used Oil Management	Science Building Room 201	Peer auditors observed one (1) improperly labeled 1 gallon of used oil.	40 CFR 279.22	R 299.9810 (3)
146	RCRA-Used Oil Management	Science Building Room 219	Peer auditors observed two (2) improperly labeled 24 oz containers of used oil.	40 CFR 279.22	R 299.9810 (3)
147	RCRA-Used Oil Management	Science Building Room 303	Peer auditors observed one (1) improperly labeled 1-gallon container of used oil.	40 CFR 279.22	R 299.9810 (3)
148	RCRA-Used Oil Management	Wayne H. Buell Management Building Penthouse - Elevator Room	Peer auditors observed one (1) improperly labeled 1-quart container of used oil.	40 CFR 279.22	R 299.9810 (3)
149	TSCA - LBP	University South Housing	Failure to provide purchaser or lessee any records or reports available to the seller or lessor pertaining to lead-based paint and/or lead-based paint hazards in the target housing	40 CFR § 745.107(a)(4)	N/A - No equivalent state regulation
150	TSCA - LBP	University South Housing	Failure to retain a copy of the completed disclosure records for no less than three years from the commencement date of the lease or the completion date of the sale pursuant to 40 CFR § 745.113(c)(1)	40 CFR § 745.113(c)(1)	N/A - No equivalent state regulation

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151	TSCA - LBP	University South Housing	Failure to provide purchaser or lessee EPA-approved lead hazard information/pamphlet	40 CFR § 745.107(a)(1)	N/A - No equivalent state regulation
152	TSCA - LBP	University South Housing	Failure to disclose to purchaser or lessee the presence of any known lead-based paint and/or lead-based paint hazards in the target housing	40 CFR § 745.107(a)(2)	N/A - No equivalent state regulation
153	TSCA - LBP	University South Housing	Failure to include, as an attachment or within the contract to lease target housing, the Lead Warning Statement	40 CFR § 745.113(b)(1)	N/A - No equivalent state regulation
154	TSCA - LBP	University South Housing	Failure to include, as an attachment or within the contract to lease target housing, a statement by the lessor disclosing the presence of known lead-based paint and/or lead-based paint hazards or indicating no knowledge of the presence of lead-based paint and/or lead-based paint hazards	40 CFR § 745.113(b)(2)	N/A - No equivalent state regulation
155	TSCA - LBP	University South Housing	Failure to include, as an attachment or within a contract to lease target housing, a list of any records or reports available to the lessor that pertain to the presence of any known lead-based paint and/or lead-based paint hazards in the target housing or to indicate that no such records are available pursuant to 40 CFR § 745.113(b)(3)	40 CFR § 745.113(b)(3)	N/A - No equivalent state regulation
156	TSCA - LBP	University South Housing	Failure to include, as an attachment or within a contract to lease target housing, a statement by the lessee affirming receipt of the information required by 40 CFR §§ 745.113(b)(2) and (b)(3) and the lead hazard pamphlet required under 15 USC §2686 as specified in 40 CFR § 745.113(b)(4)	40 CFR § 745.113(b)(4)	N/A - No equivalent state regulation
157	TSCA - LBP	University South Housing	Failure to include, as an attachment or within a contract to lease target housing, the signatures of the lessors, agents and lessees certifying to the accuracy of their statements, as well as dates of said signatures, pursuant to 40 CFR § 745.113(b)(6)	40 CFR § 745.113(b)(6)	N/A - No equivalent state regulation